

White, Marlene

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**From:** Witkovski, Gary  
**Sent:** Wednesday, June 14, 2017 10:07 AM  
**To:** White, Marlene  
**Subject:** FW: Exide Technologies - EPA ID IAD069619765 - Response to NOPF  
**Attachments:** Exide EPA Region 7 RCRA 5-year inspection followup 2017.pdf

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**From:** HUME, Julia (Manchester) [mailto:Julia.Hume@na.exide.com]  
**Sent:** Wednesday, June 14, 2017 8:48 AM  
**To:** Witkovski, Gary <Witkovski.Gary@epa.gov>  
**Cc:** BODEAU, Marc (Manchester) <Marc.Bodeau@na.exide.com>  
**Subject:** Exide Technologies - EPA ID IAD069619765 - Response to NOPF

RECEIVED  
JUN 15 2017  
AWMD/WEMM

Mr. Witkovski,

Mr. William Starks visited Exide Technologies in Manchester, Iowa and performed the 5-year RCRA Compliance Inspection at our facility on May 24 -25, 2017. I have attached an advance copy of our responses and comments to the Notice of Preliminary Findings from that inspection. The letter is being sent overnight in today's mail.

Mr. Starks has been very helpful as we drafted our responses.

Julia M. Hume  
Environmental, Health & Safety Manager  
Exide Technologies  
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RCRA 06/15/2017



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June 14, 2017

Advance Copy Sent via Email - [witkovski.gary@epa.gov](mailto:witkovski.gary@epa.gov)  
USPS Next Day

Mr. Gary Witkovski  
Neal Smith Federal Building  
210 Walnut Street, Room 473  
Des Moines, IA 50309-2109

RE: Exide Technologies – Manchester, Iowa  
EPA ID: IAD069619765  
Follow up to Notice of Preliminary Findings – Inspection 05/24-05/25/17

Dear Mr. Witkovski,

On May 24 and May 25, 2017, Mr. William Starks performed the 5-year RCRA Compliance Inspection for USEPA Region 7 at Exide Technologies (Exide), located at 913 S. 10<sup>th</sup> Street, Manchester, Iowa. Mr. Starks drafted a Notice of Preliminary Findings at the end of the inspection. There were seven preliminary findings noted by Mr. Starks. All items have been addressed with several issues that were resolved at the time of the inspection. Where applicable, both a "before" and an "after" photo are included.

Each Preliminary Finding noted during the inspection is listed below with Exide's response.

1. **Preliminary Finding:** Failure to make a hazardous waste determination on four different containers of waste in the waste building, 40CFR262.11

**Response/Action:** Four unlabeled containers were located in the waste building during the time of the inspection. Disposition for all four containers is detailed below.

Container A: A 30-gallon steel drum containing lead dross/scrap and baghouse dust was awaiting shipment to the smelter for recycling. The site since confirmed that it could go to the smelter in the current drum so it was labeled "Non-Regulated Waste" and staged for shipment. **This container is not a RCRA waste.**

Container B: A 95-gallon plastic overpack drum contained broken lead-acid batteries packaged in a steel drum. This stream is handled as a non-waste and is sent back to the smelter as "Broken Batteries" for lead reclamation. The drum was stored in the waste building as it is a secure area prior to repackaging the batteries for shipment to the smelter. The batteries have been labeled as "Broken Batteries" and packaged for shipment. **This container is not a RCRA waste.**

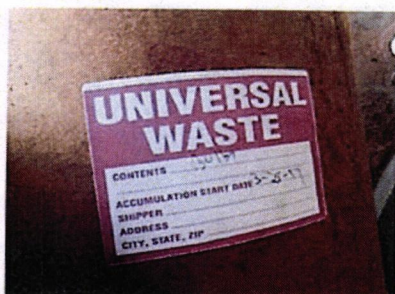


Container C: A 55-gallon steel drum contained melted plastic material cleaned from a ventilation duct. Sampling of the material in the drum showed lead contamination of 0.328 mg/L, well below the lead TCLP of 5.0 mg/L. The material was disposed of as a nonhazardous waste. **This container is not a RCRA waste.**

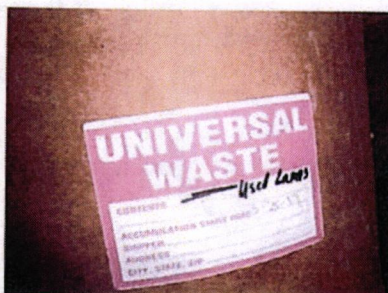
Container D: A 5-gallon bucket contained non-hazardous epoxy bled from a line to conduct maintenance on the epoxy heating system. After the inspection, the container was labeled and it was then disposed of as a nonhazardous waste. **This container is not a RCRA waste.**

2. **Preliminary Finding:** Failure to label three Universal Waste lamp containers with the words "Universal Waste Lamps" or "Waste lamps" or "Used lamps," 40CFR273.14(e)

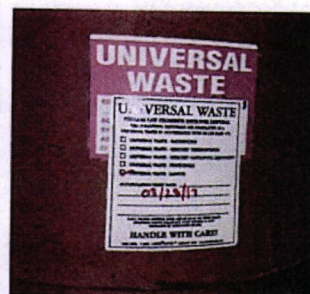
**Response/Action:** The wording was revised at the time of the inspection. Labels with a selection of Universal Waste names were purchased to use on future containers to eliminate the alternate waste names. The site will temporarily continue to use the larger purple label with the words "UNIVERSAL WASTE" but will include the smaller label from which to select a named waste stream and to document the accumulation start date. The plant will transition to using only the new labels when the existing supply of the previously used labels is exhausted. Examples of a previous label, the updated label, and the new labeling system are shown below.



Previous label



Updated label



New labeling system

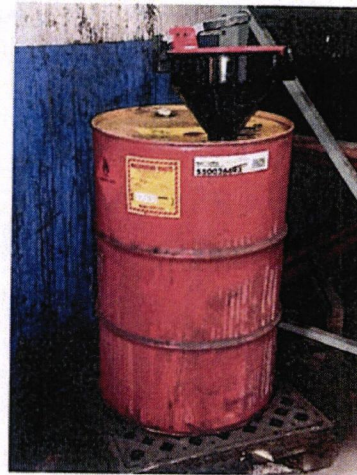
3. **Preliminary Finding:** Failure to close hazardous waste satellite accumulation container, 40CFR262.34(c)(1)(i) and 40CFR265.173(a).

**Response/Action:** The drum in question is the maintenance shop Waste Oil drum. A latching funnel was purchased immediately and installed on all waste oil satellite storage areas. The "before" and "after" pictures can be seen below.





Before



After securing funnel

4. **Preliminary Finding:** Failure to describe emergency equipment capabilities in the RCRA Contingency Plan, 40CFR262.34(a)(4) and 265.52(e).

**Response/Action:** The Integrated Event Response Plan was revised to include more detailed information about the response equipment capabilities as stored for emergency use. The full plan is available upon request.

5. **Preliminary Finding:** Failure to include a description of actions needed to respond to an explosion in the RCRA Contingency Plan 40CFR262.34(a)(4) and 265.52(a).

**Response/Action:** The Integrated Event Response Plan was revised to include more detailed information regarding response to explosions. The full plan is available upon request.

6. **Preliminary Finding:** Failure to designate one emergency coordinator as primary, and list the others in the order they will assume responsibility as alternates in the RCRA Contingency Plan, 40CFR262.34(a)(4) and 265.52(d).

**Response/Action:** The Integrated Event Response Plan was revised to specify that the Emergency Coordinator is called first with a designated Alternate. During off hours, the Plant Supervisor assumes the role of Emergency Coordinator. The full plan is available upon request.

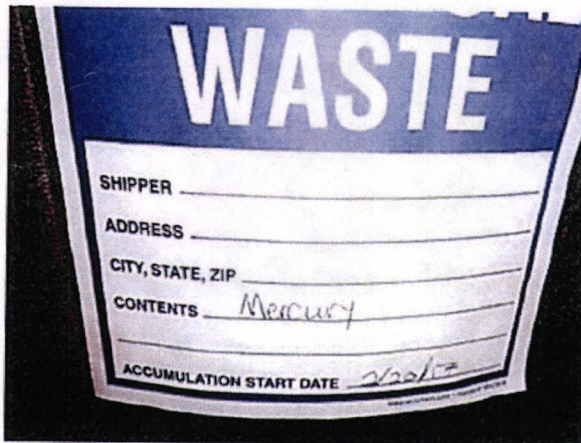
7. **Preliminary Finding:** Failure to label Universal Waste mercury containing equipment container with the words, "Universal Waste Mercury Containing Equipment" or "Waste mercury containing equipment," or "Used mercury containing equipment," 40CF273.14d(1)

**Response/Action:** The wording was revised at the time of the inspection. Labels with a selection of Universal Waste names were purchased to use on future containers to eliminate the alternate waste names. The site will temporarily continue to use the larger purple label with the words "UNIVERSAL WASTE" but will include the smaller label from which to select a named waste stream and to document the accumulation start date. The plant will transition



US EPA Region 7  
June 14, 2017

to using only the new labels when the existing supply of the previously used labels is exhausted. Examples of a previous label and the new labeling system are shown below.

A white waste label with a blue header containing the word "WASTE" in large white letters. Below the header, there are several fields: "SHIPPER" with a line, "ADDRESS" with a line, "CITY, STATE, ZIP" with a line, "CONTENTS" with the handwritten word "Mercury", and "ACCUMULATION START DATE" with the handwritten date "2/20/12".

Previous label


A white "UNIVERSAL WASTE" label with a blue header. The label includes fields for "SHIPPER", "ADDRESS", "CITY, STATE", "CONTENTS", and "ACCUMULATION START DATE". It also features a section for "UNIVERSAL WASTE" with checkboxes for "HAZARDOUS WASTE", "HAZARDOUS MATERIAL", "HAZARDOUS SUBSTANCE", "HAZARDOUS SOLID", "HAZARDOUS LIQUID", "HAZARDOUS GAS", "HAZARDOUS SLURRY", "HAZARDOUS PASTE", "HAZARDOUS SEMISOLID", "HAZARDOUS SOLID", "HAZARDOUS LIQUID", "HAZARDOUS GAS", "HAZARDOUS SLURRY", "HAZARDOUS PASTE", "HAZARDOUS SEMISOLID". The date "2/20/12" is handwritten in the "ACCUMULATION START DATE" field. The label also includes the text "HANDLE WITH CARE" and "DO NOT REUSE THIS LABEL FOR OTHER PURPOSES".

New labeling system

Exide respectfully requests that the actions already taken to address each Preliminary Finding be taken into consideration when evaluating the report submitted by Mr. Starks.

If you have any questions or comments about the information presented in this follow up report, please do not hesitate to contact Julia M Hume, EHS Manager by email at [Julia.hume@na.exide.com](mailto:Julia.hume@na.exide.com).

Sincerely,



Marc Bodeau  
Plant Manager  
Exide Technologies

Attachments